

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
PLAINTIFF

v.

DISTRICT COURT

No. 04-251 JJF

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921
DEFENDANT

PLAINTIFF'S FIRST SET OF INTERROGATORIES DIRECTED TO THE DEFENDANT

TO: JOELLEN SHELDON, DEFENDANT
FROM: ASHLEY ADAMS, PLAINTIFF

Pursuant Rule 33 of the Federal Rules of Civil Procedure,
Plaintiff, Ashley Adams (hereinafter "Plaintiff" or "Adams") hereby
propounds and serves the following written Interrogatories to
Defendant, JoEllen Chapen Seldon (hereinafter "Defendant" or "Sheldon") to be
answered under oath, within 30 days of service and provided to Ashley Adams,
PO Box 7652, Newark, DE 19714, for mailing of 716 N Barrett Lane, Christiana,
DE 19702. These Interrogatories are deemed to be continuing. The answers to
said Interrogatories are to be kept current so as to require further or
supplemental answers between the time the Interrogatories are served and the
time of hearing or trial. If any of the Interrogatories cannot be answered in full,
they should be answered to the extent possible.

INSTRUCTIONS AND DEFINITIONS

A. Plaintiff hereby makes demand that the Defendant answer the following Interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure.

These Interrogatories must be answered as provided in Rule 33 of the Federal Rules of Civil Procedure, and the Answers must be served within thirty (30) days after the interrogatories are deemed served.

These interrogatories are deemed to be continuing as to require the filing of Supplemental Answers promptly in accordance with Rule 26(e) of the Federal Rules of Procedure, in the event Defendant or their representatives (including counsel) learn additional facts not set forth in its original Answers or discover that information provided in the Answers is erroneous. Such supplemental Answers may be filed from time to time, but not later than 30 days after such further information is received.

These Interrogatories are addressed to you as a party to this action; your answers shall be based upon information known to you or in the possession, custody or control of you, your attorney or other representative acting on your behalf whether in preparation for litigation or otherwise.

In answering these Interrogatories, you are required to furnish all information that is available to you or subject to reasonable inquiry by you, including information in your possession or the possession of your attorneys, advisers, or other persons directly or indirectly employed by or connected with you or your attorneys and anyone else otherwise subject to your control. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to answer each interrogatory as completely as possible. The omission of any name, fact, or other item of information from the Answers shall be deemed a representation

that such name, fact, or other item was not known to Defendant, their counsel, or other representatives at the time of service of the Interrogatories.

You shall supply information responsive to these Interrogatories, whether such information is in your direct or indirect possession, custody, or control. If you cannot answer any Interrogatory fully, answer the Interrogatory to the extent possible and state your inability, and the reason for your inability, to answer the remainder of the question.

If you claim any privilege as to any document covered by these Interrogatories, please furnish a list identifying such document, and providing the following information with respect to each:

- a. a description of the document sufficiently particular to identify it for purposes of a court order;
- b. the date of the document;
- c. the number of pages of the document;
- d. a list of all persons who participated in the preparation of the document;
- e. a list of all persons who have received or reviewed copies of the document;
- f. a list of all persons to whom the document was circulated, or its contents communicated; and
- g. the nature of the protection claimed.

B. For purposes of these Interrogatories:

1. "You" and/or "your" refer to the Defendant.
2. "Plaintiff" or "Adams" refers to Ashley Adams.
3. "And" and "or" each shall refer to both a disjunctive and conjunctive, and each occurrence of either term shall be read as

"and/or", as required to make a request or Interrogatory inclusive rather than exclusive.

4. The use of a plural form shall include the singular form and the use of the singular form shall include the plural form as required to make a request inclusive rather than exclusive.
5. "Document" means any written, printed, typed, recorded or other graphic matter of any kind or nature, including drafts and copies bearing notations or marks not found on the original; including but not limited to all memoranda, reports, financial reports, notes, letters, envelopes, telegrams, e-mails, other electronic data, messages (including reports, notes and memoranda or telephone conversations and conferences), studies, analysis, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, minutes of all other communications of any type, including inter- and intra-office communications, purchase orders, questionnaires and surveys, blueprints, plans, charts, graphs, tapes or other recordings, punch cards, magnetic tapes, discs, data cells, drums, print-outs and other data compilations from which information can be obtained (translated, if necessary, by Defendant into usable form).
6. Except where otherwise specifically defined in the text of the particular interrogatory, the word "identify" shall have the following meaning:
 - a. As used herein "identify" or "identity", when used in reference to a document, means to state:
 - 1) Date and author or addressor;

- 2) Type of document (e.g., letter, memoranda, telegram, chart, etc.) or some other means of identifying it;
- 3) The subject matter of said document;
- 4) The recipients of all copies of said documents; and
- 5) Its present location or custodian including the address where such document may be found. If any such document was but is no longer in your possession or subject to your control, state what disposition was made of it.

In lieu of stating items (3) and (5), Defendant may furnish simultaneously with the service of Answers to these Interrogatories, such documents for inspection and copying by Plaintiff.

- b. As used herein "identify" or "identity" used in reference to a firm, partnership, association or corporation means to state its business name and present address, the names and present addresses of the principal owners, participants, partners, officers and/or employees and its present telephone number.
- c. As used herein "identify" or "identity" used in reference to an individual person means to state his full name, current address and telephone number, occupation and place of employment.

7. "Person" means any person or persons, business, company, partnership, firm, distributor or other entity.

8. The past tense shall be construed to include the present tense, and vice versa, to make the request inclusive rather than exclusive.

C. If any information called for by any Interrogatory herein is withheld because you claim that such information is contained in a privileged document and/or communication, for each such written document or communication state:

- 1) Its date and type (e.g., letter or memorandum);
- 2) Its author;
- 3) The identity of the addressee;
- 4) The identity of all other persons who have received copies or otherwise have been permitted to see all or part of the original or any copy thereof;
- 5) A description of each subject matter discussed, described or referred to therein;
- 6) The name of its present custodian.
- 7) These interrogatories require supplementation, pursuant to Rule 33 of the Delaware Rules of Civil Procedure for the Court of Common Pleas.

D. **Answer** may be appended to additional paper if necessary, typed or legibly handwritten.

INTERROGATORIES

Interrogatory No. 1.: State your full name, alias names, marital status, home address, date of birth, social security number, employer's name and address, and drivers license number.

Answer:

Interrogatory No. 2.: State each address at which you have resided or maintained a residence and list the addresses of those residences, and the inclusive dates thereof.

Answer:

Interrogatory No. 3.: State the name and the address of your employer, your position and duties, education level, where you obtained your education, stating the name and address of each school or other academic or vocational institution you have attended, the dates you attended; the highest grade level you have completed, and the degrees received, and your wages at the time of the automobile accident and at the present time.

Answer:

Interrogatory No. 4.: State in detail your itinerary on the date of the auto accident, including each place at which you were present, your length of stay at each such place, and a detailed account of whom you saw and what you did at each such place.

Answer:

Interrogatory No. 5.: Identify the motor vehicle your were operating at the time of your collision with the Plaintiff, including its make, year, model, registration number and registered owner, and the maintenance record concurrent for the years applicable to this vehicle.

Answer:

Interrogatory No. 6.: Identify all persons known to you to have personal knowledge or information of the facts pertaining to the occurrence, and indicate those who were eye witnesses, and state the substance of their knowledge and articulate their expected testimony, describing in detail the knowledge or information possessed by each person, the bases or sources from which the knowledge or information has been derived, identifying all persons to whom the individual has communicated any of the knowledge or information possessed, together with the time, date, place and circumstances of the communication and identity of all documents that memorialize the communication.

Answer:

Interrogatory No. 7.: Identify all persons (excluding attorneys) who investigated the cause and the circumstances of the personal injury automobile accident for you, providing any documentary evidence that you claim or may claim is relevant to the issues of this action, stating the name, address and occupation of the person or organization conducting the investigation, the date or dates on which the investigation was conducted, whether the plaintiff or anyone acting on the plaintiff's behalf has interviewed or spoken with the defendant or any of its agents or employees about the event in question, identifying the individual spoken with and the substance of the conversation.

Answer:

Interrogatory No. 8.: Identify all persons who arrived at the scene of the automobile accident within one (1) hour after the automobile accident, whom you had conversations with either in person or by telephone and the substance of the conversation(s), who claim to have heard any statements, or claim knowledge of the automobile accident providing documentations of time of these conversations, whom and the time of these conversations, whether any statements, written or otherwise, obtained from anyone other than you by a person acting on your behalf in connection with the occurrence described, stating the date of each statement, the name and the address of each person whose statement was taken, whether such statement was written, recorded or

taken by any other means, the name and the address of the person who took such statements and the name of the address of the present custodian of such statements, stating in particularity if you have given any statements, written, recorded or stenographic to anyone concerning the automobile accident, if so, the dates they were given, the name and the address of each person taking such statements, and the name and the address of the present custodian of the statement(s), whether an investigation was conducted concerning the automobile accident, stating the name, address and occupation of the person or organization conducting the investigation, the date or dates on which the investigation was conducted, whether plaintiff or anyone acting on plaintiff's behalf has interviewed or spoken with defendant or any of its agents or employees about the event in question, if so, please identify the individual spoken with and the substance of the conversation. Whether as a result of the investigation you were arrested or were any citations issued to you on charges arising out of the occurrence, why or why not, identifying the court wherein the charges or citations were filed, and state the disposition of those charges or citations.

Answer:

Interrogatory No. 9.: Provide to me with the name, address and telephone number of each person you intend to call as a witness, who claim to have witnessed the occurrence immediately before or after the automobile accident, who heard any statements made about the automobile accident by any individual and anyone claim to have knowledge of the automobile accident, or who were present at the scene within sixty minutes of the occurrence, or otherwise had knowledge of the occurrence, designating which of such people actually claims to have witnessed the occurrence, and designating which of such people were otherwise informed that is the subject of this action. For each witness listed, include a short summary of the testimony you expect the witness to give in court.

Answer:

Interrogatory No. 10.: If you have engaged, or expect to engage, expert witnesses, identify all persons by name, providing their professional address, occupation, specialty, who is skilled in any particular field or science, including the field of medicine, whom you expect to call as expert witnesses at trial in this matter and who has expressed an opinion upon any issue of this action, for each such person, whether the witness is a retained expert or non-retained expert, state the following, the subject matter of the expert testimony; the field or science in which each such person is sufficiently skilled to enable him to express opinion evidence in this action, the qualifications of each opinion witness, including a *curriculum vitae* and/or resume, if any; and a

summary of the facts, opinions and conclusions to which the expert is expected to testify; and the basis therefore, and whether such potential witness will base his/her opinion, in whole or in part upon facts acquired personally by him in the course of an investigation or examinations of any of the issues of this case, *or* solely upon information as to facts provided him by others, if your answer discloses that any such witness has made a personal investigation or examination relating to any of the issues of this case, state the nature and dates of such investigation or examination, each and every fact, and each and every document, item, photograph or other tangible object supplied or made available to such person, whether such persons have rendered written reports, *if* so, give the dates of each report, state the name and address of the custodian of such reports.

Answer:

Interrogatory No. 11.: If you were not the owner of the vehicle mentioned in Interrogatory No. 8, identify its owner, stating his/her, or its relationship to you, whether you had his/her, or its permission to operate said vehicle, the purpose for which you were operating said vehicle, and how you came to be operating said vehicle.

Answer:

Interrogatory No. 12 .: Identify all persons whom you have given signed statements, recorded statements, regarding the automobile accident, the date thereof, and the name of the person in whose custody each is at this time

Answer:

Interrogatory No. 13.: Identify all persons who have given you signed statements regarding the automobile accident or the personal injuries suffered by the Plaintiff in the automobile accident.

Answer:

Interrogatory No. 14.: State whether you have within your possession or control photographs, plats, or diagrams of the scene of the automobile accident or objects connected with said motor vehicle accident, stating what those objects are.

Answer:

Interrogatory No. 15.: Give a concise statement of facts as to how you contend the automobile accident took place.

Answer:

Interrogatory No. 16.: If you contend that either Plaintiff acted in such a manner as to cause or contribute to her personal injuries, state all facts upon which you rely to demonstrate this.

Answer:

Interrogatory No. 17.: Provide a detailed description of the incident "in your own words" as you recall the occurrence, stating the time of day, the physical address and location, what if anything precipitated the incident, including your mental state at the time of the incident, whether or not you were consuming alcohol or under the influence of illegal drug or prescription drugs, whether or not you were using a cellular telephone at the time of the incident, if using a cellular telephone, your conversation contents of that telephone conversation, your demeanor at the time of the occurrence, and any stress factors that may relate to the incident, providing a detailed

description of process by which the automobile accident occurred, including, but not limited to, a timeline of events, describing in detail, a description of the events.

Answer:

Interrogatory No. 18.: Identify all expert witnesses who will be called at the trial of this case, the area of expertise in each, and a summary of the expected testimony of each, identifying all persons by name, providing their professional address, occupation, specialty, who is skilled in any particular field or science, including the field of medicine, whom you expect to call as expert witnesses at trial in this matter and who has expressed an opinion upon any issue of this action, for each such person, whether the witness is a retained expert or non-retained expert, state the following, the subject matter of the expert testimony; the field or science in which each such person is sufficiently skilled to enable him to express opinion evidence in this action, the qualifications of each opinion witness, including a *curriculum vitae* and/or resume, if any; and a summary of the facts, opinions and conclusions to which the expert is expected to testify; and the basis therefore, and whether such potential witness will base his/her opinion, in whole or in part upon facts acquired personally by him in the course of an investigation or examinations of any of the issues of this case,

or solely upon information as to facts provided him by others, if your answer discloses that any such witness has made a personal investigation or examination relating to any of the issues of this case, state the nature and dates of such investigation or examination, each and every fact, and each and every document, item, photograph or other tangible object supplied or made available to such person, whether such persons have rendered written reports, *if so:* give the dates of each report, state the name and address of the custodian of such reports.

Answer:

Interrogatory No. 19.: State whether you consumed or ingested any drugs, medicines, alcoholic or intoxicating beverages within forty-eight (48) hours prior to said occurrence, the place where such drugs, medicines, or alcoholic beverages were obtained, the nature of the drugs, medicines, or alcoholic beverages, and the amount thereof, if so, state: the name, address, and telephone number; the nature or description of each substance; the quantity of each substance used or taken; the date and time or day when each substance was used or taken; the name, address, and telephone number of each person who was present when each substance was used or taken; and the name, address, and telephone number of any health care provider who prescribed or furnished the substance and the condition for which it was prescribed or furnished, describing your mental alertness status, whether unduly affected by stress or situation(s) of distraction, stating with particularity whether you have

ever been in a substance abuse, voluntary or involuntary, alcohol or drugs, voluntary or involuntary, driving rehabilitation programs, voluntary or involuntary, listing dates of attendance, completion status; name(s) of organizations and addresses.

Answer:

Interrogatory No. 20.: Have you ever been arrested, questioned, or detained for an arrest of any crime, felony or misdemeanor, vehicular or non-vehicular, if so, when, where, and name of the victim(s), stating what the outcome of the alleged charges, if injuries involved, the seriousness of these injuries, to include hospitalization or emergency medical treatment, conviction of the crime, if so, stating the original charge made against you, that charge of which you were convicted, whether or not you plead guilty of the charge or were you convicted after trial, the court and case number, and the outcome.

Answer:

Interrogatory No. 21.: State in particularity, your description of how the impact of your vehicle occurred with the Plaintiff's vehicle.

Answer:

Interrogatory No. 22.: If you claim to have had a conversation with the Plaintiff, after impacting Plaintiff's car, describe in detail the substance of the conversation with the Plaintiff, and what actions you initiated at the time of the impact or immediately there following.

Answer:

Interrogatory No. 23.: State whether you were under the care of a physician, in particularity, medical illness, psychological illnesses at the time of the automobile accident. If so, state the name and address of your physician, specify the illness or condition for which you were treating, and list any prescribed medication, stating all medical illnesses, psychological, mental illnesses for diagnosis or treatment of, listing these in chronological order with the most recent recording first, repeating all medical and mental illnesses and treatments for the prior ten (10) years of the automobile accident, up to and including present.

Answer:

Interrogatory No. 24.: State when and where you obtained your driver's license, including whether your license is or was subject to any restriction, the nature of such restriction, if any; any and all violations to your

driving license, since your application for a drivers license up to and including present.

Answer:

Interrogatory No. 25.: Except for this lawsuit, have you, ever been a party to a civil lawsuit, or had any other claim or suit filed against you, if so, *state*, separately each claim or suit, cause of action, including court and case number, briefly describing the nature of the suit, the name of your attorney, if any, name(s) and addresses of all other parties to the case, if you were the plaintiff or defendant, what the nature of the claim, when, where and in what court was the action commenced, stating the names of all the parties other than yourself.

Answer:

Interrogatory No. 26.: List all insurance agreements you have made regarding the vehicle you were operating at the time of the occurrence, including the name of the owner, the name of the insurance carrier, the policy number(s), the type of coverage, the amount of coverage, including policy limits, and the effective dates of said policy(s) for the last ten (10) years, including any other insurance policies in effect at the time of the automobile accident covering bodily injuries caused to another person, providing all pertinent information, including the name of the insurer, the policy number(s), the type of coverage, the amount of coverage, specifying policy limits, and the effective dates of said policy(s) for the last ten (10) years, stating whether or not any insurance company has an interest in the outcome of this litigation identifying all policies of insurance that may furnish coverage for any of the claims asserted against you in this lawsuit and, or are you aware of any other form of indemnity which applicable to this matter, if so, stating the name and address of the company or companies, including any excess or umbrella carriers, which you claim to provide coverage, the policy number or other designation of any applicable policy, the amount of the coverage, the limit or limits of liability of each policy, any exclusions, limitations, or restrictions on coverage, the name of the insured on each policy, the type of insurance, effective policy period, whether the insurance carrier has accepted or denied coverage, whether you are being defended by the insurance carrier under a reservation of rights, attaching a copy of the declaration page or certificate of coverage of such policy of insurance(s) to your answers to these Interrogatories.

Answer:

Interrogatory No. 27.: List all prior and subsequent motor vehicle accidents in which you have been involved, either with other persons or property, including the name of any other driver or property owner involved, the location of the collision, the date and time of the collision, and the disposition of the matter.

Answer:

Interrogatory No. 28.: List all violations of the motor vehicle laws of any and all states in which you have resided or traveled through with which you have been charged since you obtained your drivers license, including any violations without a drivers license.

Answer:

Interrogatory No. 29.: State whether your automobile insurance has ever been cancelled, and if so, the name of the insurer and the reason for cancellation, listing all prior and subsequent automobile insurance policies, effective or non-effective.

Answer:

Interrogatory No. 30.: State whether the vehicle of the Plaintiff was moving at the time of the automobile accident, and if so, state the direction and speed of said vehicle.

Answer:

Interrogatory No. 31.: State in detail which part of your vehicle came into contact with which part of the vehicle of the Plaintiff.

Answer:

Interrogatory No. 32.: State in detail all actions you took or attempted to take to avoid the automobile accident, if you contend that you were in fact driving in a safe, lawful manner.

Answer:

Interrogatory No. 33.: If you contend that the personal injuries of the Plaintiff was not caused by the collision with your vehicle, state with particularity the facts upon which you base your contention, how, if applicable, those facts were known to you, by who and when.

Answer:

Interrogatory No. 34.: List all arrest charges for misdemeanors, felonies, either for unlawful vehicular operation, moving or non-moving violations, or crimes against citizens in any state you have resided or visited, indicating the date, the location, the specific charge, and the disposition.

Answer:

Interrogatory No. 35.: List all employment held by you during the preceding ten years and with regard to each employment state, the name and address of each employer, your position, job title or description, if you had an employment contract, the date on which you commenced your employment and, if applicable, the date and reason for the termination of your employment, your current gross and net income per pay period, your gross income as shown on

the last W-2 tax and wage statement received by you, your social security wages as shown on the last W-2 tax and wage statement received by you, and the amounts of all deductions shown thereon; and all additional benefits or perquisites received from your employment stating the type and value thereof, listing any source of income other than from your employment listed, if, with regard to each source of income, state the source of income, including the type of income and name and address of the source, the frequency in which you receive income from the source, the amount of income received by you from the source during the immediately preceding three years, and the amount of income received by you from the source for each month during the immediately preceding three years.

Answer:

Interrogatory No. 36.: State if you own any interest in real estate, if so, with regard to each such interest state the following, the size and description of the parcel of real estate, including improvements thereon; the name, address and interest of each person who has or claims to have an ownership interest in the parcel of real estate; the date your interest in the parcel of real estate was acquired; the consideration you transferred or paid for your interest in the parcel of real estate; your estimate of the current fair market value of the parcel of real estate and your interest therein; and the amount of any indebtedness owed on the parcel of real estate and to whom.

Answer:

Interrogatory No. 37.: During the preceding ten years, list any owned stocks, bonds, securities or other investments, including savings bonds, and with regard to each such stock, bond, security or investment state the description of the stock, bond, security or investment, the name and address of the entity issuing the stock, bond, security or investment, the present value of such stock, bond, security or investment, the date of acquisition of the stock, bond, security or investment, the cost of the stock, bond, security or investment, the name and address of any other owner or owners in such stock, bond, security or investment, and if applicable, the date sold and the amount realized there from.

Answer:

Interrogatory No. 38.: State whether you are owed any money or property, stating the name and address of the debtor, the form of the obligation, the date the obligation was initially incurred, the amount of the original obligation, the purpose or consideration for which the obligation was incurred, the description of any security connected with the obligation, the rate of interest on the obligation, the present unpaid balance of the obligation, the dates and amounts of installment payments, and the date of maturity of the obligation.

Answer:

Interrogatory No. 39.: State the year, make and model of each motor or motorized vehicle, motor or mobile home and farm machinery or equipment in which you have an ownership, estate, interest or claim of interest, whether individually or with another, and with regard to each item state, the date the item was acquired, the consideration paid for the item, the name and address of each other person who has a right, title, claims or interest in or to the item, the approximate fair market value of the item, and the amount of any indebtedness on the item and the name and address of the creditor; list the names of all partnership, corporations, enterprises or entities in which you have an interest in or claim any interest, the nature of your interest or claim or interest therein, the amount of percentage or your interest or claim or interest therein, and an estimate of the value of your interest, stating whether or not in the preceding five years, if you have made any gift of cash, property, real or personal to any person or entity, stating the description of the gift, the value of the gift, the name and address of the person or entity receiving the gift, whether or not there is written evidence of the existence of a gift and the description of the written evidence.

Answer:

Interrogatory No. 40.: During the preceding seven years, have you sold, transferred, conveyed, encumbered, concealed, damaged or otherwise disposed of any property owned by

you and or with another individual, individually or collectively, to regard to each item of property state, a description of the property, the current location of the property, the purpose or reason for the action taken by you with regard to the property, the approximate fair market value of the property, whether or not there is written evidence of any such transaction; and a description of the written evidence.

Answer:

Interrogatory No. 41.: Show for the preceding ten years, prepared financial statements amounts, net worth statements amounts or lists of assets and liabilities pertaining to your property or financial affairs, with regard to each such document(s) stating the name and address of the person preparing each such document(s), the type of document(s) prepared, the date(s) the document(s) were prepared, and the location of all copies of each such document(s), listing chronologically the net amount(s) for each sub-category of financial/net worth statements.

Answer:

Interrogatory No. 42.: If you contend that plaintiff was not injured in the automobile accident, or if you contend that the injuries or the extent of the injuries claimed by plaintiff were not caused by the automobile accident, state the name, address, and telephone

number of each individual who has knowledge of the facts upon which you base your contention.

Answer:

Interrogatory No. 43.: At the time of the automobile accident did you have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the incident? If so, state: the nature of the disability or condition; and the manner in which the disability or condition contributed to the occurrence of the incident, and if you attribute any physical, mental, or emotional injuries to the automobile accident.

Answer:

Interrogatory No. 44.: Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each: state all facts upon which you base the denial or special or affirmative defense; state the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and identify all documents and other tangible things that

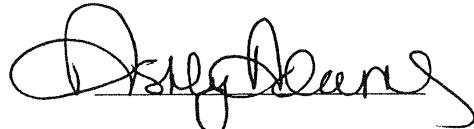
support your denial or special or affirmative defense, and state the name, address, and telephone number of the person who has each document.

Answer:

Interrogatory No. 45.: Identify each person who participated in the preparation of the Answers to these Interrogatories, and, for each person so identified, state the nature of his or her personal involvement and participation regarding the Answer to each Interrogatory that he or she participated in answering.

Answer:

Respectfully submitted,



Ashley L. Adams
716 N Barrett Lane
Millsboro, DE 19702

P.O. Box 7052
Newark, DE 19714

Pro Se Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
PLAINTIFF

DISTRICT COURT

v.

No. 04-251 JJF

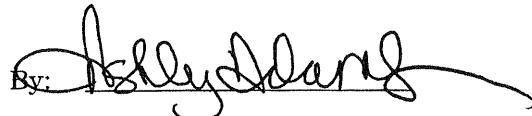
JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921
DEFENDANT

TO: The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N King Street
Lock Box 44
Wilmington, DE 19801

NOTICE OF SERVICE

PLEASE TAKE NOTICE that, on this 27th day of November, 2006,
two (2) true and correct copies of the foregoing **PLAINTIFF'S FIRST SET of**
INTERROGATORIES DIRECTED TO THE DEFENDANT were served upon the
Defendant's Attorney via **prepaid first class certified mailed, signed receipt**
requested and addressed as follows:

Beth H Christman
CASARINO, CHRISTMAN & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: 

Ashley T Adams
716 N Barrett Lane
Christiana, DE 19702

Pro Se Plaintiff

Dated: November 23, 2006